

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LEGACY RESTORATION, LLC,	:	
	:	
<i>Plaintiff,</i>	:	
	:	Case No. 1:25-CV-05319
v.	:	
OSWALDO “JUNIOR” BARAJAS,	:	
USA CONTRACTING CO, LLC, LEAH	:	
RAFFLES, AND BRIAN WOLFF,	:	
	:	DECLARATION OF
<i>Defendants.</i>	:	MARGARET HOPE ALLEN
	:	IN SUPPORT OF
	:	PLAINTIFF’S MOTION FOR
	:	<u>INJUNCTIVE RELIEF</u>
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Margaret Allen declares, pursuant to 28 U.S.C. § 28 1746, under penalty of perjury, that the following is true and correct:

1. My name is Margaret Hope Allen. I am a partner at Sidley Austin LLP and legal counsel for Legacy Restoration, LLC in the above-referenced matter. I am licensed to practice law in the State of Texas and admitted to practice before this Court *pro hac vice*.

2. On June 25, 2025, in my role as legal counsel for Legacy, I provided notice to Defendants Oswaldo “Junior” Barajas, USA Contracting Co, LLC, Leah Raffles, and Brian Wolff (collectively, “Defendants”) of the intent of Legacy to file a lawsuit and a request for a temporary restraining order (“TRO”) against them in the Commercial Division of the Supreme Court of the State of New York (the “Commercial Division”). The Courts of the Commercial Division require a plaintiff to attempt to provide actual notice of a TRO application *before* filing the request for a TRO.

3. Accordingly, on June 25, 2025, I provided notice to each of the Defendants of Legacy's intent to file the lawsuit, as shown at the times and by the means described on the chart below. As shown on the chart below, I also sent copies of the complaint and the request for TRO (collectively, the "Filings") to Defendants by email, and by text message by sending to Defendants' cell phone numbers a link to a publicly-available Google Drive account where the Filings were posted.

Defendant	<u>Time Text Message Sent Giving Notice of Intent to File Lawsuit</u>	<u>Time of Voicemail Giving Notice of Intent to File Lawsuit</u>	<u>Time of Phone Call from Defendant</u>	<u>Time of Email Providing Notice of Intent to File Lawsuit</u>	<u>Time of Email Providing Copies of Filings</u>	<u>Time Text Message Providing Copies of Filings</u>
1. Raffles	8:39am ET	8:46am ET	8:48am ET	8:42am ET	11:50am ET	12:05pm ET
2. Barajas	8:38am ET	8:42am ET	No phone call	No email sent	No email sent	12:06pm ET
3. Wolff	8:39am ET	8:44am ET	1:53pm ET	2:04pm ET	2:04pm ET	12:04pm ET

4. I did not send Defendant Barajas notice or the Filings by email because I did not have a personal email address for him.

5. Attached as Exhibit A are the communications detailed in the above chart sent to Defendant Raffles.

6. Attached as Exhibit B are the communications detailed in the above chart sent to Defendant Barajas.

7. Attached as Exhibit C are the communications detailed in the above chart sent to Defendant Wolff.

8. Attached as Exhibit D and E are true and correct copies of email correspondence with David Knight and Alex Skelton.

I declare under penalty of perjury that the following is true and correct. Executed on this
July 7, 2025.

/s/ Margaret Hope Allen

Margaret Hope Allen